

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

IQVIA HOLDINGS INC.,

and

PROPEL MEDIA, INC.,

Defendants.

Case No. 1:23-cv-06188-ER

**NOTICE OF MOTION AND
MOTION TO QUASH SUBPOENA
TO APPEAR AND TESTIFY AT A
HEARING OR TRIAL IN A CIVIL
ACTION**

PLEASE TAKE NOTICE that as soon as counsel may be heard by the Court, based on this Notice of Motion; the Memorandum of Law in Support of Real Chemistry, Inc.’s (“Real Chemistry”) and Charles Hemann’s (“Mr. Hemann”) Motion to Quash Plaintiff Federal Trade Commission’s (“FTC” or “Plaintiff”) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action issued to Real Chemistry and Mr. Hemann by Plaintiff on November 20, 2023 (the “Trial Subpoena”); and the Declaration of Charles Hemann in support thereof, Real Chemistry and Mr. Hemann will move this Court, at the Thurgood Marshall United States Courthouse located at 40 Foley Square, Courtroom 619, New York, New York 10007, for an order pursuant to Federal Rule of Civil Procedure 45(d) granting its motion to quash the Trial Subpoena.

Dated: November 21, 2023

ROPES & GRAY LLP

/s/ Jonathan Klarfeld

ROPES & GRAY LLP

Jonathan Klarfeld

Chong S. Park (*pro hac vice* application
pending)

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